

June 24, 2021

VIA ECF

The Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: ***United States v. Anthony Cheedie, et al.*, No. 19 Cr 833 (SHS)**  
**Request for Modification of Bail Conditions**

Dear Judge Stein:

We represent defendant Kevin Handren in the above-captioned matter. We write on behalf of Mr. Handren to respectfully request that the Court modify the conditions of bail imposed on Mr. Handren. Specifically, we ask that Mr. Handren be permitted to travel within the contiguous 48 states, provided that he receive pre-approval from his pretrial services officer at least 48 hours in advance of any intended travel across state lines.

We have discussed the proposed modification both with Assistant U.S. Attorney Kiersten Fletcher and with Mr. Handren's Pretrial Services Officer, Annie Carr Ingebritson. Neither has any objection to the proposed modification of Mr. Handren's bail conditions. Mr. Handren will further comply with any relevant COVID-related orders in effect at the time of any pre-approved travel.

Thank you for Your Honor's consideration of this request.

Very truly yours,



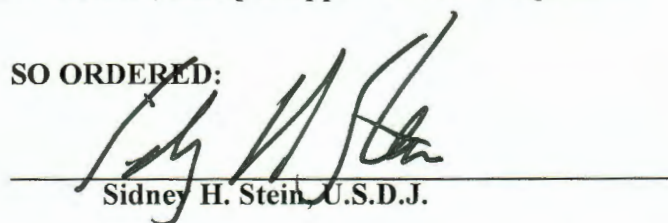
Samidh Guha

cc: AUSA Kiersten Fletcher  
PTSO Annie Carr Ingebritson (via email)

**Defendant's request to travel within the contiguous 48 states, with pre-approval from his pretrial services officer, is granted.**

**Dated: New York, New York**  
**June 25, 2021**

SO ORDERED:

  
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Sidney H. Stein, U.S.D.J.